

REMARKS

Claims 49-85 are presently pending in this application. The Examiner rejected claims 49-85. By this Response, claims 49, 60, 61, 70, 74, 83-85 have been amended. The amendment made to the claims are fully supported by the specification as originally filed. No new matter has been introduced. Reconsideration of this application for allowance of all pending claims are hereby respectfully requested in view of the following remarks.

Rejection Under 35 U.S.C. § 102(e)

In Section 19 of the Office Action, the Examiner rejected claims 49-85 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,526,426, issues to Lakritz (hereafter Lakritz). The Applicants respectfully traverse.

Independent claims 49, 60, 61, 70, 74, 83, 84, and 85 recite “accessing content in a first language, including content retrieved by crawling a web site via following links to additional pages”. The Applicants respectfully submit that Lakritz does not teach this claimed feature. Lakritz teaches a translation management and process control system (see Abstract, Column 3, line 16) that accesses content stored in a database and loads its components. However, Lakritz does not teach accessing content by crawling a web site via following links to additional pages, as recited in independent claims 49, 60, 61, 70, 74, 83, 84, and 85.

In addition, independent claims 49, 60, 61, 70, 74, 83, 84, and 85 recite “generating statistics based on the one or more translatable components”. The Examiner asserts that Lakritz discloses this claimed feature and cites Lakritz “The UsageLog contains a summary of country and language statistics” (Col. 15, lines 47-48). The Applicants maintain their position that the “language statistics”, as disclosed in Lakritz, is not “statistics based on one or more translatable components”, as recited in claims 49, 60, 61, 70, 74, 83, 84, and 85. Furthermore, independent

claims 83, 84, and 85 recite “wherein the statistics are used to measure the size the content for language translation”. The Applicants respectfully maintain their position that Lakritz does not teach this claimed feature. See the Response to the previous Office Action.

It is well-settled that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Since Lakritz fails to disclose and teach at least two claim elements recited in independent claims 49, 60, 61, 70, 74, 83, 84, and 85, the Applicants respectfully submit that Lakritz does not anticipate claims 49, 60, 61, 70, 74, 83, 84, and 85. Thus, claims 49, 60, 61, 70, 74, 83, 84, and 85 are patentable.

Since independent claims 49, 60, 61, 70, 74, 83, 84, and 85 are patentable for the reasons discussed above, claims that depend from these independent claims are also patentable for at least the same reasons stated above with respect to their respective independent claims and for the additional features recited therein.

Further, the Applicants respectfully submit that the recited feature “by crawling web content and content linked from the web content” is not obvious. Lakritz merely teaches a translation management and process control system that accesses content stored in a database and loads its components. Lakritz is intended to translate what is visible on a page, including dependent components such as graphics, audio, video, and other multimedia components. However, Lakritz does not translate or schedule for translation other non-dependent documents linked from the document by crawling the links in the document to retrieve additional pages for translation. In addition, under Lakritz, each document to be translated must be already stored in the database. Because Lakritz aims at solving a different problem, there is no motivation for

Lakritz to teach or suggest to crawl web content and content linked from the web content, as recited in independent claims 49, 60, 61, 70, 74, 83, 84, and 85.

According to MPEP § 2143.03, the section entitled "All Claim Limitations Must Be Taught or Suggested" sets forth the applicable standard for establishing obviousness under § 103:

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (citing *In re Royka*, 180 USPQ 580 (CCPA 1974)).

Therefore, in the instant case, the pending rejection does not "establish *prima facie* obviousness of [the] claimed invention" because Lakritz fails the "all the claim limitations" standard required under § 103. Therefore, claims 49, 60, 61, 70, 74, 83, 84, and 85 are not obvious over Lakritz. Since all other claims depend from claims 49, 60, 61, 70, 74, 83, 84, and 85, they are not obvious over Lakritz either.

Accordingly, it is believed that all pending claims are now in condition for allowance. Applicant therefore respectfully requests an early and favorable reconsideration and allowance of this application. If there are any outstanding issues which might be resolved by an interview or an Examiner's amendment, the Examiner is invited to call Applicant's representative at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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